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July 29, 2024

VIA ECF

Honorable Renée Marie Bumb, C.U.S.D.J.
United States District Court
District of New Jersey
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

Re: *Guy A. Shaked Investments, Ltd., et al. v. Ontel Products Corp.*
Docket No. 1:20-cv-9901 (RMB-EAP)

Dear Chief Judge Bumb:

This firm is counsel to Plaintiffs Guy A. Shaked Investments, Ltd. and DAFNI Hair Products, Ltd., (collectively “DAFNI”) in the above-referenced matter. We write jointly with counsel for Defendant Ontel Products Corporation (“Ontel”) to provide a status update. Although the parties have been productively discussing an amicable resolution of this litigation over the preceding months, continued progress toward potential resolution appears unlikely at this time. Accordingly, Ontel believes that it is now an appropriate time to resume the underlying litigation. DAFNI respectfully requests an additional 45 days to continue discussions and because DAFNI, a family company based outside of the United States, is actively engaged in retaining new litigation counsel. DAFNI proposes that the parties jointly report back to the Court by **September 12, 2024**. Rather than setting another joint report date, Ontel respectfully requests that the Court establish a date certain on which the case will resume, as more than 30 days have already elapsed since DAFNI’s prior litigation counsel moved to withdraw from this litigation (*see* ECF Nos. 257 and 258).

If DAFNI’s request meets with the Court’s approval, we ask that Your Honor please

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enter “So Ordered” below. We thank the Court for consideration of this request.

Respectfully submitted,

s/ Maureen T. Coghlan

MAUREEN T. COGHLAN

MTC

cc: All counsel of record via ECF

It is SO ORDERED as of this 31st day of July,
2024.



HON. RENÉE MARIE BUMB, C.U.S.D.J.